Louis J. Hoffman (Cal. Bar #139566)
HOFFMAN & ZUR
14614 North Kierland Boulevard, Suite 300
Scottsdale, Arizona 85254
Tel.: (480) 948-3295
Fax: (480) 948-3387
Email: LJH@patentit.com
Attorneys for Defendant Peterson

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA

PB FARRADYNE, INC., Plaintiff/Counterdefendant	)	Case No. C-05-3447 (SI)
vs.	)	DECLARATION OF LOUIS J. HOFFMAN IN SUPPORT OF PETERSON'S MOTION FOR PARTIAL SUMMARY JUDGMENT OF INFRINGEMENT
THOMAS D. PETERSON, Defendant/Counterclaimant.	)	

Louis J. Hoffman declares that the following is true and correct of his personal knowledge:

1. I am an attorney licensed to practice law in the State of California and before this Court. My law firm represents Mr. Peterson in this matter.

2. Attached are true and correct copies of the documents listed below, marked with the corresponding exhibit numbers:

   A. Page 5 and cover/signature pages from PBF's interrogatory answer, which I received from PBF's counsel on February 15, 2006, marked as Exhibit DX10.

   B. Page 5 and cover/signature pages from PBF's supplemental interrogatory answer, which I received from PBF's counsel on July 14, 2006, marked as Exhibit DX11.

   C. The pages from a PBF-drafted document entitled "System Design and Algorithms to Support Incident Selection and Driving Time Calculation" that pertain to the driving time calculation, which I received from PBF's counsel in response to a request for production of documents that I served on behalf of Mr. Peterson, production numbers PBF002734-37 & 42-50, marked as Exhibit DX21.

D. A printout from a website maintained by PBF at www.511.org and more specifically the page at http://traffic.511.org/glimpse/faq.asp#f89 which I accessed and printed on September 6, 2006, marked as Exhibit DX22.

3. Exhibit DX19 consists of three maps, prepared by a computer consultant under my direction:

A. The first page is a copy of the map received by Mr. Peterson from MTC, DX17, described in Mr. Peterson's accompanying declaration, which I received from Mr. Peterson and forwarded to the computer consultant with instructions to format it to expand to an entire page.

B. The second page is a map prepared by plotting some of the data on sensor location received by Mr. Peterson from MTC, DX17, but limited to data about dual-loop sensors and SpeedInfo radar detectors. Except for changing the code for SpeedInfo detectors to a green dot, the plot reproduces the location of all of the data received from MTC. To plot the locations of the dual-loop sensors, the computer consultant restricted the data set received from MTC, under my direction, to only those that matched entries in the sensor list received by Mr. Peterson from *Caltrans*, DX 18, also described in Mr. Peterson's accompanying declaration, for which coding in the Caltrans data revealed that the entry related to a dual-loop sensor. The computer consultant was able to do that cross-referencing automatically by importing the electronic data received from Caltrans and MTC into a spreadsheet and a mapping program. The plot shows the locations of the dual-loop sensors as green triangles. The data revealed that the MTC 511 system relies on 1107 dual-loop sensors and 533 SpeedInfo radar detectors.

C. The third page is a map prepared by plotting the remainder of the sensors identified in the MTC data, DX17, *i.e.*, those other than the ones plotted on the second page. As with the dual-loop sensors, the computer consultant used the Caltrans data, DX18, to identify the type of sensor, for the mainline RTMS sensors (of which there were 64), dual-loop magnetometers (of which there were 21), and single-loop sensors (of which there were 30). The MTC data also included locations of toll-tag readers (of which there were 82), so no cross-referencing was needed there.

I declare under penalty of perjury that the foregoing is true and correct. Signed this 13th day of November, 2006, at Scottsdale, Arizona.

s/Louis Hoffman
Louis J. Hoffman